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Attorneys for Plaintiff TRINA GUNNARSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TRINA GUNNARSON)	Case No.: 2:20-cv-02107-CB
Plaintiff,)	
v.)	STIPULATION TO EXTEND TIME
)	TO FILE MOTION FOR REMAND
KILOLO KIJAKAZI,)	
Acting Commissioner of Social)	(FIRST REQUEST)
Security,)	
)	
Defendant.)	

Plaintiff Trina Gunnarson and Defendant Kilolo Kijakazi, Acting
Commissioner of Social Security, through their undersigned attorneys, stipulate,
subject to this court's approval, to extend the time by 24 days from July 9, 2021 to
August 2, 2021 for Plaintiff to file a Motion for Remand, with all other dates in the
Court's Order extended accordingly. This is Plaintiff's first request for an
extension. This request is made at the request of Plaintiff's counsel to allow

1 additional time to fully research the issues presented. Counsel requests the
2 extension due to an increase in workload related to the re-opening and processing
3 of several administrative records close in time. Additionally, in the past weeks
4 Counsel has been called to assist family after a family member suffered a stroke
5 and is now bedridden and lost the ability to speak. Counsel apologizes for the
6 inconvenience this request has caused.

7 DATE: July 29, 2021

Respectfully submitted,

8 LAW OFFICES OF LAWRENCE D. ROHLFING

9 /s/ *Cyrus Safa*

10 BY: _____

Cyrus Safa

11 Attorney for plaintiff Trina Gunnarson

12
13 DATE: July 29, 2021

14 Christopher C. Chiou

Acting United States Attorney

15
16 /s/ *Daniel P. Talbert*

17 BY: _____

Daniel P. Talbert

18 Special Assistant United States Attorney

Attorneys for defendant Kilolo Kijakazi,


19 Acting Commissioner of Social Security

|*authorized by e-mail|

20 **ORDER**

21 IT IS SO ORDERED.

22 DATE: July 30, 2021

23 

24 THE HONORABLE CARLA BALDWIN

25 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:20-CV-02107-CB**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on July 30, 2021.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Cyrus Safa

Cyrus Safa
Attorneys for Plaintiff